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Marlboro Youth Repeater Association

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September 8, 1998

Before the Federal Communications Commission
Washington, D.C. 20554

In the matter of)	
1998 Biennial Review)	WT Docket 98-143
--Amendment of Part 97)	RM-9148
of the Commission's)	RM-9150
Amateur Service Rules.)	RM-9196

The following comments are the official position of the Marlboro Youth Repeater Association and have been drafted by Leonard J. Umina, Trustee:

We wish to file the following comments for consideration by the FCC:

1. **We DO NOT support the renaming of license classes** from the traditional names to Class A, B, C, D etc. We feel this is inappropriate, cold, unfriendly and creates an air of complexity and technicality that is not required. We do not feel that these proposals have examined the true cost of this change from a procedural and environmental standpoint.
2. **We DO NOT support dropping the 20 WPM code test** for the Extra Class License, and we DO NOT support the elimination of Morse Code in the Amateur Service.
3. **We DO NOT support power limitations** in the current Novice Band segments.
4. **We DO NOT support dropping of the Novice Class License.**

1. **We DO support the expansion of the question pool** to include more questions on boolean logic, computer programming, and modern digital techniques.
2. **We DO support alternative actions** by the FCC to bolster and strengthen Amateur Radio, as **outlined herein.**
3. **We DO support changes to the Novice Class License** as outlined herein.

We offer the following comments on the initiative embodied by Docket 98-143:

1. We believe that the dwindling number of new amateurs is being effected by events and trends **not addressed by this initiative.**

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2. We believe that **licensing requirements will have no effect** on the number of amateur radio operators.
3. We believe that the Commission has some authority to effect the situation and **have recommended alternative actions**.

Background

1. We believe the dwindling number of hams is due to several factors **not related to amateur radio or amateur radio licensing**. These include the following:
 - a. Amateur Radio is a Technical Hobby, and requires a minimal skill set for participation. Among these skills are math, English, and good study habits. According to Professor Jennings at Arizona State University, a recognized expert in the subject, this ability has been in serious decline nationwide for over two decades. We quote, “students who should be scoring in the 90th percentile are barely scoring in the 70th; those who should be at the 70th are hovering between the 30th and 40th. Eighty-seven percent of students entering New York community colleges flunk the placement test – they can’t even pass the test that would put them into remedial courses!...As New York Mayor Rudolph Guiliani observed several years ago, if skills actually determined entrance into the New York system of higher education, three of every four students would probably be denied admission....one third of all American high school seniors could not compute the price of a \$1,250 stereo that was discounted by 20 percent.”
Obviously without the ability to read, write, or compute simple math, ham radio as a hobby is not an alternative for an increasing number of young people simply because of the failure of our educational system. This does not justify changing the licensing procedures.
 - b. According to the United States Government, there have been over 30 million abortions in the United States in the past 25 years. Most of these abortions have been performed on upper middle class females, the very same ones that might have given birth to those with the ability and the means to participate in Amateur Radio. **Cutting the supply of potential new hams by over 50% has a very real impact on Amateur Radio** and this cannot be addressed by changing the licensing procedures.
 - c. Amateur Radio activities by young people REQUIRE parental involvement. Parental involvement is hard to acquire when 67% of mothers work outside the home, and single parent homes led by females now make up the majority of U.S. Households. In spite of a mothers intent to assist a child in the pursuit of Amateur Radio, very few single parent mothers live in areas where antennas are permitted or physically possible. Further, many often have trouble dealing with the physical activity of constructing a simple dipole antenna or have access to the tools necessary to do so. Again, these **demographic facts are not addressed by changes to the Amateur Radio rules, nor could they be in our opinion.**
 - d. Special “restrictive covenants” are now being used to enforce racism and maintain sameness among residents of virtually every new construction project in the United States. Unfortunately, **one common element of these restrictions is the**

construction of outside antennas. While VHF repeater operation is not inhibited, virtually every type of HF operation, and therefore the incentive to upgrade, is effected.

2. **We believe that the Amateur Radio Relay League has not done a very good job of recruiting new Amateur Radio Operators.** Very little monies are expended on advertising outside of the hobby and the result has been that most citizens do not even know that Amateur Radio exists, even though many have directly and indirectly benefited from it, and often on a daily basis. **We will offer a proposal to address this.**
3. **Many older hams are actually working against the entry of new hams.** This situation has been exacerbated by organizations that attempt to control spectrum usage and can be seen in earlier petitions filed by the ARRL that attempted to make spectrum usage compliance “good amateur practice”. What it was instead was a scheme to control who could and could not use the spectrum. We submit attachment A as a written exhibit of just one such action taken by “older hams” against a group of younger hams in our area, which actually led to the formation of this organization. **We will offer a proposal to address this situation.**
 - a. Under the guise of “spectrum management” many “coordinated repeaters” exist on paper but are not actually in operation or widely supported by the Amateur community. It’s who do you know or who came first in a paperwork shuffle. **This situation is detrimental to new hams** because they are often not permitted to participate in existing Amateur repeaters or organizations due to a “generation gap”, and many of the highly attractive services, like autopatch for example, are not available to them as a result. **We submit Attachment A as a real demonstration of this.**
 - b. New hams are often told that “all the frequencies are taken” when in fact many are open but assigned to “**paper**” repeaters that do not exist. This reservation of spectrum **prevents or slows the growth of sub cultures within the Amateur Service that many younger hams would find attractive.**
4. **Bootlegging** is becoming an increasing problem for those attempting to operate within the law and it is a disincentive for licensed amateur radio operators. The proposal does not address this situation and we feel that it must be considered in any major proposal to restructure the Service.
5. The elimination of a simple “Novice Class” license addresses a symptom but not a problem. We believe that our proposals will address the problem and that this will result in an increase in the number of new hams, **many of whom would particularly benefit from having a Novice Class.**

Counter Proposals

1. **Increasing Public Awareness of the Amateur Service by FCC Action.** We propose that all VEC’s be required to increase the charge for Amateur Exams to \$10

and that the FCC require the difference between the current fees (\$6.35) and \$10.00 to be mandated for advertising in non amateur radio media to attract new hams. We further suggest that all VEC's be required to advertise their own public relations and information contact points and sufficiently staff same, or that these monies be turned over to the ARRL for proper disposition strictly in this regard.

2. **Open American Soil for Antenna Construction Again.** We propose that the FCC take strong action against Restrictive Covenants as they have now become so predominant that they threaten to strangle the Amateur Service. We propose that any Amateur Radio Operator be permitted by Federal Fiat to construct antennas on their property according to their technical purpose and intended use and with good engineering practices up to 200 feet in height.
3. **Utilize Amateur Technical Material in the Remedial Educational Activities of other Federal Agencies.** We propose that the FCC communicate with the Department of Education and discuss the potential inclusion of material required to pass Amateur Exams in Federally mandated curriculum as a potential way in which the national interests can be furthered by the cooperation of these departments. Even material which is not directly Amateur related, but scientific in general, could bolster the technical capability of our youth while at the same time laying the groundwork in our school systems for a new generation of hams. This activity may be symbiotic and of high benefit to society in general and Amateur Radio specifically.
4. **Make no changes to the current use of Morse Code in the licensing system.** We propose that no changes be made to the current licensing system for the following reasons:
 - a. **The environmental impact of developing, reprinting, and disseminating a new license structure has not been addressed by this proposal.** Millions of trees will need to be utilized to effect these wide changes to the Amateur Service, and we feel that they will have little or no effect on the situation as intended. We further feel that simple activities, as outlined above in proposals 1-3 would have much less impact on the environment from a biological standpoint.
 - b. **We feel that the removal of Morse Code is detrimental to the national security of the United States.** In the aftermath of a major nuclear attack, Morse Code might be one of the means of communication that the survivors can construct equipment to utilize. Therefore, widespread knowledge of the Morse Code and proficiency in it is a potential Civil Defense issue. We strongly suggest that the United States Government use it's resources to effect the international position on this issue, in addition set an example for preparedness by rejecting the proposed changes to this section of the NPRM.
 - c. **We feel that the reduction of Morse Code as a focus in the Amateur Radio Service is a racist endeavor and discriminates against nations of color and other developing areas in the world who do not have the means to deploy sophisticated communications technology in their societies.** We further observe that the abandonment of the Morse Code exacerbates the language barrier, which while easily transitioned by Morse Code Q Signals, is virtually impossible to transition with other modes in direct person to person contacts except among the highly educated. This, we feel, **runs counter to the mandate**

for the Amateur Service to promote international friendship and cooperation.

5. **Counter Bootlegging with simple procedures.** We believe that the majority of bootlegging could be thwarted by requiring that anyone purchasing Amateur Radio Equipment be required to show proof of license or identification with electronic verification of license. For example, proof of identification might be accomplished using a simple piece of picture ID such as a driver's license, and a quick lookup on www.qrz.com or some other service that permits easy verification of an Amateur License. We also feel that these procedures are more important today in the era of terrorism than ever before, and strongly urge consideration of this simple change to the rules and regulations. *At the same time, we feel that the restrictions on 10 meter amplifiers could be dropped.*
6. **Take Action to prevent Frequency Reservation.** We believe that frequency coordination is an important activity, however we also feel that the common practice of reserving spectrum for paper repeaters needs to be stopped. We think this can be done informally, without new regulation, but it should be done through a formal request or channel perhaps by mention in the results and summary of the actions taken as a result of this NPRM.
7. **Retain but expand Novice Privileges to create an operable license class.** Most hams avoid the Novice license because it offers little payback in privilege with massive associated problems (like dealing with restrictive covenants) as compared with the Technician Class License where VHF operation is unrestricted and there are few complications (unless you are young as addressed in attachment A). We believe the Novice Class could be enhanced significantly by making the following changes to the license.
 - a. All Novice licensees should have Technician Class privileges above 50 Mhz. This should be in recognition of the fact that learning Morse Code is roughly equivalent to the Technical Exam as it now stands, and justifies these privileges. By virtue of having learned the Morse Code, HF privileges for the Novice Class license should be increased as outlined below.
 - b. All Novice licenses should have the power limitations removed from their license class for their current sub bands, which should be retained.
 - c. All Novice licenses should be given sub bands on 15, 40, 80, and 160 meters for SSB operation. These sub bands should be created in the bottom 25 Khz of the current General Class segments on these bands (excepting 160 of course, which will require a segment to be chosen), permitting efficient antenna construction.

Summary

In our opinion the FCC is right to focus it's attention on the issue of increasing the number of Amateurs in the United States. **We believe that only modifications to the Novice Class are in order**, however, and that no general change to the other classes of license or modifications to the Morse requirements are justified or desirable. We also feel that certain specific actions by the FCC could have a major positive effect on

Amateur Radio and we strongly urge their consideration. These **include complete preemption of antenna restrictions** and informal **discouragement of “paper repeaters”** which serve to discourage new ham activity on the VHF bands, as well as a proposal to **fund recruitment through additional license exam fees** using non-Amateur Service media.

We recognize, and attempted to communicate with minimal space, that **many societal changes are effecting the Amateur Service**. While many of these are beyond the scope of the FCC, working with the Department of Education is clearly warranted and has been suggested as a potential avenue for further action.

Finally, we have proposed that the environmental and logistical aspects of major changes to the Amateur Radio Service are not only detrimental to the Service, they have wide ranging potential impact on mankind if implemented as proposed.

To: Len K1LU

From: W1AQI, WA1OQK, WA1QXK, KB1RO, KV1W, W1PFX, K1GXT, and
licensed XYLS

As a result of numerous complaints regarding how the 27 machine is being used, a meeting was held on 19 May 1998. Members present stated their dissatisfaction with how the Umina Family is using the repeater. Other members let their dissatisfaction be known by telephone. A minimum of 70% of the owner/operators of the 27 machine are very upset, to say the least. It was agreed that one of us would write to you regarding this. Since my call is on the machine, I volunteered.

As you know, we have one of the best operating and most available machines in the area. A tremendous amount of work was put into the machine since it was WA1IOB. We installed all new radios, an amplifier, changed antenna location, added new feed lines, and totally redesigned the equipment physical layout. We improved it so much that it now has Supercoverage in a 6,400 square mile pattern. (That's 80 miles east and west and 80 miles north and south.) With coverage this great, the machine shouldn't be used for the purposes that the Umina Family is using it. For example; you are using it as a babysitter, intercom between yard and house, telephone, kids toy thing, and an over-the-kitchen table discussion media. This is not the purpose of this machine nor is it for any ham radio repeater.

Some visitors to the machine have expressed interest in using the machine on a limited basis but have informed us later that with the "JUNK" that's on the machine, they chose to go somewhere else. We WANT visitor activity on the machine.

Although your children follow procedures as far as ID'ing, they do not use the repeater in the manner in which it is intended. They passed a test and got their license but they are not ham operators. The fooling around on the buses, in school, and in the house and yard is not acceptable.

As far as N1XYA is concerned, the conversations that take place between her and K1LU are not the type that we want on the machine. 99% of the discussions you have with her are conversations you should have eyeball to eyeball and not for the world to have to listen to. This must change since nobody wants to hear this. Many of the members have turned off their radios or purchased tone decoders to filter out your QSOs and are losing interest to the point that they may not renew next year.

Another problem we have is with N1ZNX. He passed a test, THAT'S IT! He knows nothing about radio procedures and uses the repeater to discuss business while using profanity. This is an FCC legal issue and directly affects me as trustee. He is to CEASE using the repeater.

Speaking of business QSO's, N1LU has been monitored more than once making business meeting arrangements over the repeater when working with Ultramet.

It appears that most of the people you "coached" into passing a test have done nothing but turn this machine into a super CB Machine.

From this time on, if you want to converse with your children via ham radio, find a simplex frequency. They are not to use the machine until they learn that the Hams on the machine do not want to listen to their personal problems with their siblings and parents.

Many times N1XYA has been heard using the patch to tell the kids to turn on the radio in the kitchen so that she can tell them that she is two minutes from the house. This is not acceptable.

We feel that a letter detailing the problems with the "K1LU Group" is better than getting on the air and discussing it. We hope that you have these problems rectified within one day of receiving this memo.

Thank you for your prompt attention.

No verbal reply is necessary.

W1AQI